

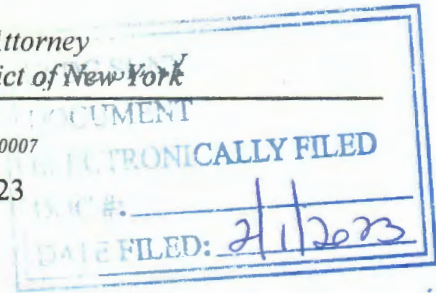


U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

January 31, 2023



VIA ECF

Hon. Colleen McMahon
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: APG Gems Inc., et al. v. Jaddou, et al., 22 Civ. 8298 (CM)

Dear Judge McMahon:

MEMO ENDORSED

Colleen McMahon
2/1/2023

This Office represents the government in this action in which the plaintiffs challenge the government's denial of an I-129 Petition for a Nonimmigrant Worker. I write respectfully to request that the initial conference presently scheduled for February 2, 2023, be adjourned to the week of April 3, 2023, or thereafter (with a corresponding extension of time for the preconference submission). *See* ECF Nos. 4, 15.

I respectfully request this adjournment because the complaint was just served on the government last week, on January 25, 2023. The government calculates the deadline for it to respond to the complaint to be March 27, 2023. *See* Fed. R. Civ. P. 12(a)(2). In the meantime, the government needs time to review the complaint, confer with U.S. Citizenship and Immigration Services, and determine next steps. This is the government's first request for an adjournment of the initial conference. Plaintiffs consent to this request.

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/ Joshua S. Press
JOSHUA S. PRESS
Special Assistant United States Attorney
86 Chambers Street, 3rd Floor
New York, New York 10007
Telephone: (202) 305-0106
E-mail: joshua.press@usdoj.gov
Attorney for Defendants

cc: Counsel of record (via ECF)